

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF GEORGIA ATLANTA DIVISION

Charlie Mayes,

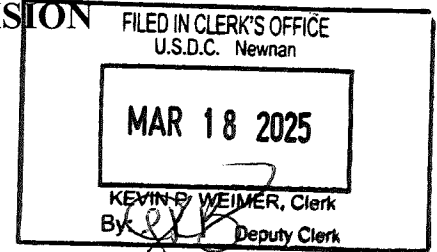
Plaintiff,

v.

DOUGLAS COUNTY, GEORGIA,

SUSAN CAMP, in her individual
and official capacity as Chief
Magistrate Judge of
Douglas County,

Defendants.



CIVIL ACTION NO.:

Demand For Jury Trial

1:25-CV-1417

COMPLAINT

Plaintiff Charlie Mayes (hereinafter "I or Me or His or My or He") hereby brings this Complaint seeking damages, declaratory and injunctive relief for the violations of my rights to contracts. **Chief Magistrate Judge Susan Camp of Douglas County Georgia** intentionally violated my Constitutional Rights to Contract as well as my other Federal and Georgia State Constitutional Rights to Contract on multiple occasions in open court against my multiple objections.

JURISDICTION AND VENUE

This action arises under the authority vested in this Court by virtue of 42 U.S.C. § 1983, 28 U.S.C. § 1331, 28 U.S.C. § 1343, 28 U.S.C. § 2201 and 28 U.S.C. § 1367 (pendant jurisdiction). Venue is proper in this Court.

PARTIES

1. I am the Plaintiff Charlie Mayes and a resident of Carroll County, Georgia, who was unlawfully arrested as well as imprisoned for invoking my Constitutional Rights and all of my other rights.

2. Defendant **Chief Magistrate Judge Susan Camp** is at all times herein mentioned the Chief Magistrate Judge for the Douglas County, Georgia. She was acting under color of state law during the relevant acts and omissions alleged herein. She is being sued in her official and individual capacity for damages.

FACTUAL ALLEGATIONS

3. I Charlie Mayes was at the time a 49-year-old, who is an African American, 100% disabled Honorably Discharged Veteran of the United States Army with no criminal history.

4. On **May 1, 2023** via a Zoom Meeting I attended for **Case# 23MV02236** Douglas County Magistrate Court to evict three tenants as the **Property Manager of JonJai Quality Housing, LLC** after I lawfully terminated their Lease/Contract. Chief Magistrate Judge Susan Camp proceeded to intentionally and maliciously violate my Constitutional Rights and Civil Rights, regarding my Right to Contract. The specific rights she violated were **United States Constitution Article 1 Section 10 Clause 1, Civil Right Act of 1866 US 42 Section 1981** and the **Georgia Constitution Article 1 Section 1 Paragraph 10**. This was after I took the time and care to file all of the laws with the Magistrate Court Clerk so she would know the laws and rights I was invoking. Chief Magistrate Judge Susan Camp actually swore an oath to uphold the United States Constitution and the Georgia Constitution. Chief Magistrate Judge Susan Camp unlawfully denied my correct daily rent charges, reinstated the tenant's

Lease/Contract back to a monthly rent rate. Chief Magistrate Judge Susan Camp also unlawfully directed the tenants to mail me monthly rent payments which are against the Lease/Contract terms unless approved by management. I reminded her about my Constitutional Rights and Civil Rights to contract as well as I could make a claim against her **\$100,000.00 USD** Surety Bond. She not only ignored me but told the Zoom Administrator to mute my microphone. She then promptly dismissed my case with prejudice so I could not come back to Magistrate Court again as **Property Manager of JonJai Quality Housing, LLC**.

5. I was forced to have the Lease/Contract assigned to me personally to file another eviction a couple of weeks later in an attempt to try to remove the tenants because I had a buyer that wanted to purchase the duplex building for a nice profit. That was the main reason I needed her to grant me the writ of possession so I could remove the current tenants. The buyer wanted to buy the duplex but only if I get the tenants out so he could move in Unit A. He agreed he would pay me **\$100,000.00 USD** as a down payment and I would owner finance the other **\$250,000.00 USD** at **10%** for **20** years without early loan repayment. This was in exchange for him not being able to qualify for a bank loan. The second time I came back to Magistrate Court on **July 17, 2023** for Court **Case# 23MV03899** Chief Magistrate Judge Susan Camp violated my rights for the second time within 5 minutes by dismissing my case again with prejudice. The only thing she did was ask the same tenants if they wanted to dismiss the case and they said yes and she did. I was left with no choice but to file an appeal in Douglas County State Court for Court **Case# 23MV03899** which I did win overturning both of her decisions for **Case # 23MV02236 and Case# 23MV03899**. I was so relieved to see that Judge Eddie Barker upheld his oath to uphold the United States Constitution and the Georgia Constitution and he did not violate my Civil Rights. I

was granted the full judgment per the Lease/Contract. The biggest problem was she caused me to lose my buyer twice and it ended up damaging my business relationships because I could not sell my building to him as promised and he was not at all happy about it. He told other people we conduct Real Estate Business with about the entire ordeal. Not only did I lose the **\$100,000.00 USD** down payment twice but I am no longer getting **10%** interest on **\$250,000.00 USD** for **20** years. That's a minimum loss of **\$532,691.95 USD**. Additionally I have documented proof I invested **\$200,000.00 USD** in the Stock Market in 2023 and my plan was to take that **\$100,000.00 USD** down payment from the sale of that property and buy Carvana Stock that same year. If I had done that I would have more than **4** times the profit right now.

6. On **January 31, 2024**, I submitted a demand for monetary damages, but claims have not been resolved. In addition to damages, this lawsuit seeks declaratory and injunctive relief against the defendant.

7. As a direct result of the Defendant's actions, I suffered emotional distress, humiliation and reputational injury for which I seek damages.

CLAIMS FOR RELIEF

COUNT ONE

VIOLATION OF ARTICLE 1 SECTION 10 CLAUSE 1 OF THE UNITED STATES CONSTITUTION PURSUANT TO 42 U.S.C. § 1983

(State Unconstitutionally Impairing the Right to Contract)

8. The allegations herein are incorporated into the First Claim for Relief as though fully set forth herein.

9. Defendant **Douglas County Chief Magistrate Judge Susan Camp** violated the United States Constitution Law below at **Article 1 Section 10 Clause 1** multiple times.

10. No State shall enter into any Treaty, Alliance, or Confederation; grant Letters of Marque and Reprisal; coin Money; emit Bills of Credit; make any Thing but gold and silver Coin a Tender in Payment of Debts; pass any Bill of Attainder, ex post facto Law, or Law impairing the Obligation of Contracts, or grant any Title of Nobility. **Trustees of Dartmouth College v. Woodward, 17 U.S. (4 Wheat.) 518 (1819)**

COUNT TWO

VIOLATION OF ARTICLE 1 SECTION 1 PARAGRAPH 10 OF THE
GEORGIA CONSTITUTION BILL OF RIGHTS
PURSUANT TO 42 U.S.C. § 1983

(State Impairing the Right to Contract)

11. The allegations herein are incorporated into the Second Claim for Relief as though fully set forth herein.

12. Defendant **Douglas County Chief Magistrate Judge Susan Camp** violated the Georgia Constitution Law below at **Article 1 Section 1 Paragraph 10** multiple times.

13. **Bill of attainder; ex post facto laws; and retroactive laws.** No bill of attainder, ex post facto law, retroactive law, or laws impairing the obligation of contract or making irrevocable grant of special privileges or immunities shall be passed.

COUNT THREE

VIOLATION OF THE UNITED STATES CODE 42 SECTION 1981
FEDERAL LAW
PURSUANT TO 42 U.S.C. § 1983

(Equal Rights for African Americans to Contract)

14. The allegations herein are incorporated into the Third Claim for Relief as though fully set forth herein.

15. Defendant **Douglas County Chief Magistrate Judge Susan Camp** violated the **United States Code 42 Section 1981 Federal Law** below multiple times.

(a) STATEMENT OF EQUAL RIGHTS

All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

(b) “MAKE AND ENFORCE CONTRACTS” DEFINED

For purposes of this section, the term “make and enforce contracts” includes the making, performance, modification, and termination of contracts, and the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship.

(c) PROTECTION AGAINST IMPAIRMENT

The rights protected by this section are protected against impairment by nongovernmental discrimination and impairment under color of State law.

COUNT FOUR

VIOLATION OF THE FOURTEENTH AMENDMENTS PURSUANT TO
42 U.S.C. § 1983

16. The allegations herein are incorporated into the Fourth Claim for Relief as though fully set forth herein.

17. Defendant **Douglas County Chief Magistrate Judge Susan Camp** violated the **14th Amendment of the United States Constitution** below multiple times.

18. **Section 1**

All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

COUNT FIVE

DEPRIVATION OF RIGHTS UNDER COLOR OF LAW

“Officers of the court have no immunity from liability when violating Constitutional Rights” Owen v. City Of Independence, 445 U.S. 622

19. The allegations herein are incorporated into the Fifth Claim for Relief as though fully set forth herein.

20. Douglas County Employees/Defendants, themselves or by and through their agents, intentionally deprived me of my rights and therefore are liable for damages even after they have been notified by me with an affidavit delivered by certified mail that they have been and are now currently violating my constitutional rights so they are liable for nominal, actual and presumed damages.

21. **Deprivation of rights under color of law** is a federal crime that occurs when someone willfully takes away another person's constitutional rights. This can happen when a government official abuses their power, even if they are not acting within the bounds of their lawful authority.

- **18 USC §242** provides that whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States... shall be fined under this title or imprisoned not more than one year, or both.

- **18 USC §245** provided that Whoever, whether or not acting under color of law, intimidates or interferes with any person from participating in or enjoying any benefit, service, privilege, program, facility, or activity provided or administered by the United States; [or] applying for or enjoying employment, or any perquisite thereof, by any agency of the United States; shall be fined under this title, or imprisoned not more than one year, or both.

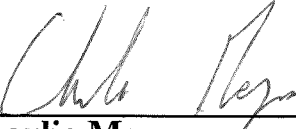
PRAYERS FOR RELIEF

WHEREFORE, on the basis of the foregoing, Plaintiff prays that this Court:

1. Enter an award of economic, compensatory, general, punitive and special damages for severe emotional distress, depression, anxiety, mental anguish, embarrassment, humiliation pain and suffering in an amount of a bare minimum of **\$10,000,000.00** by the enlightened conscience of the jury against individual Defendant;
2. Enter a declaratory judgment or preliminary and/or permanent injunction against Defendant, from violating any future, constitutionally protected Rights to Contract ;
3. Grant to me a jury trial on all issues;
4. Award to me the costs of the action and reasonable attorneys' fees, and as well as witness fees, as provided by **42 U.S.C. § 1988** and federal and state law; and
5. Grant any and all additional relief as this Court deems just and proper.

DATED: This 18th day of March, 2025

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Without Prejudice
UCC 1-207/UCC 1-308 UCC 1-103



Charlie Mayes
PLAINTIFF NAME (PRO SE)
YouCanGetThisLawsuit@Outlook.com
PLAINTIFF's ADDRESS
43 Community Square BLVD
Unit 35
Villa Rica, Ga 30180

STATE OF GA)
) **JURAT**
COUNTY OF CARROLL)

Before me the undersigned, a Notary acting within and for the County of CARROLL and State of **Georgia** on this 18th day of MARCH, 2025, personally appeared and known to me - OR - proved to me on the basis of satisfactory evidence to be the person whose names is subscribed to the within instrument, to be the identical Man, **CHARLIE MAYES**, who being duly sworn, declared the above to be true, correct, and not meant to mis-lead, to the best of his firsthand knowledge, understanding, and belief, by his free will and voluntary act and deed by his signature on the foregoing document, executed the within instrument.

Given under my hand and seal this 18th day of MARCH, 2025.

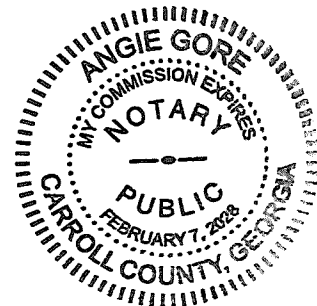
Angie Gore

Notary Signature

Seal

Angie Gore

Printed Notary Name



My commission expires 2.7.2028